

**Commonwealth of Kentucky
Division for Air Quality**

DRAFT PERMIT STATEMENT OF BASIS

DRAFT CONDITIONAL MAJOR PERMIT NO. F-05-010

BREMNER INCORPORATED

1475 U.S. HIGHWAY 62 WEST, PRINCETON, KENTUCKY

MARCH 17, 2005

BABAK FAKHARPOUR, REVIEWER

PLANT I.D. # 21-033-00033

APPLICATION LOG # 56578

GENERAL SOURCE DESCRIPTION:

Bremner Incorporated produce cookies and crackers by the following major processes:

Dry ingredient receiving and handling; scaling, proofing, cutting, shaping, and dusting flour application; baking and drying; and packaging for customer delivery.

The raw materials such as flour and sugar are brought to the plant via over the road tank trucks (fully closed) and are unloaded directly into bulk storage silos. These dry ingredients are transferred, scaled, and mixed in a fully enclosed, combination mechanical/pneumatic material handling system. Each silos is fitted with particulate control polyester cloth filters.

Dry ingredients are mixed with water and other proprietary ingredients to form dough. If the product requires that the dough be yeast-based (fermentable), the mixture is allowed to rise (proofing) in closed vats, which are maintained in a temperature, and humidity controlled room. If the products do not require yeast, the dough can be worked, cut into the desired shape, and placed directly into the oven (5 direct-fire, natural gas oven).

INDIVIDUAL UNIT, OPERATION OR ACTIVITY EMISSION AND OPERATING CAPS:

Emission points:

#08 Baking Oven A

#09 Baking Oven B,

#10 Baking Oven C,

#11 Baking Oven D,

#12 baking Oven E

Applicable Regulations:

Applicable regulations for this permit renewal are

- i) Regulation 401 KAR 59:010 -New process operations
- ii) Regulation 401 KAR 63:021 -Existing sources emitting toxic air pollutants.
- iii) Regulation 401 KAR 59:015 – New indirect heat exchangers

PLANT-WIDE EMISSION AND OPERATING CAPS:

1. Pursuant to Regulation 401 KAR 59:015, Section 4(1)(c), particulate emissions shall not exceed 0.35 lb/MBtu based on a three-hour average.
2. Pursuant to Regulation 401 KAR 59:015, Section 5(1)(c), sulfur dioxide emission shall not exceed 1.33 lb/MBtu based on a twenty-four-hour average.
3. Pursuant to Regulation 401 KAR 52:030, VOC, SO₂, and PM emissions shall not exceed 94 tons per year based on a 12 month rolling total for the entire source to preclude a major source Title V classification.
4. The permittee shall limit production rates of crackers and cookies so as to ensure that source wide emissions of VOC(s) shall not equal or exceed 94 TPY.

CREDIBLE EVIDENCE:

The permit described in this document contains provisions that require specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.